

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

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SALLY WHITE,	:	
	:	No. 2:10-cv-04078-SRC-MAS
Plaintiff,	:	
	:	ECF Case
v.	:	
	:	Motion Date: December 6, 2010
SMITHS DETECTION, INC.,	:	
SMITHS GROUP, PLC, STEPHEN PHIPSON,	:	Oral Argument Requested
PHILIP BOWMAN, CHRISTOPHER GANE,	:	
BRIAN BARK and PENNY BOYKO,	:	
	:	
Defendants.	:	
	:	
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**NOTICE OF MOTION TO DISMISS THE COMPLAINT WITH PREJUDICE
OF DEFENDANTS SMITHS GROUP PLC AND PHILIP BOWMAN**

DEBEVOISE & PLIMPTON LLP
Jyotin Hamid
(jhamid@debevoise.com)
Michael Potenza
(mpotenza@debevoise.com)
Emily J. Mathieu
(emathieu@debevoise.com)
919 Third Avenue
New York, New York 10022
Tel: 212-909-6000
Fax: 212-909-6836

*Attorneys for Defendants
Smiths Group plc and Philip Bowman*

TO: Ellen O'Connell, Esquire
Law Offices of Ellen O'Connell, LLC
30 Columbia Pike, 3rd Floor
P.O. Box 132
Florham Park, NJ 07932
Attorney for Plaintiff Sally White

PLEASE TAKE NOTICE that on December 6, 2010 at 9:00 a.m., or as soon thereafter as counsel may be heard, Defendants Smiths Group plc and Philip Bowman (“Defendants”) will move the Honorable Stanley R. Chesler, U.S.D.J., for an order granting their motion, pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6), to dismiss, with prejudice, the Complaint of Plaintiff Sally White (1) as against Mr. Bowman for lack of personal jurisdiction and failure to state a claim and (2) as against Smiths Group plc for failure to state a claim (the “Motion”).

PLEASE TAKE FURTHER NOTICE that Defendants also join in the Motion to Partially Dismiss the Complaint With Prejudice of Defendants Smiths Detection and Brian Bark to the extent such motion was granted by this Court in its Decision and Order dated October 22, 2010.

PLEASE TAKE FURTHER NOTICE that, in support of the Motion, Defendants will rely upon the accompanying Memorandum of Law and Declaration of Philip Bowman; and upon the Memorandum of Law in Support of Defendants Smiths Detection, Inc. and Brian Bark’s Motion to Partially Dismiss the Complaint [Docket Entry 11].

PLEASE TAKE FURTHER NOTICE that Defendants request oral argument if opposition to this Motion is filed.

PLEASE TAKE FURTHER NOTICE that a proposed Order also is attached.

Dated: October 25, 2010

Respectfully submitted,

DEBEVOISE & PLIMPTON LLP

By: /s/ Michael Potenza

Jyotin Hamid

Michael Potenza

Emily J. Mathieu

919 Third Avenue

New York, NY 10022

(212) 909-6000

Attorneys for Defendants

Smiths Group plc and Philip Bowman